

Federal Communications Commission
Washington, D.C.

Re: LPFM transferability rule changes

In response to your request: “we seek comment on whether we should amend our rules to permit the transfer of control of LPFM licensee entities. If we permit the transfer of control of LPFM licensees, should we impose any restrictions on such transfers, beyond the requirement that the licensee entity continue to meet our LPFM eligibility criteria?”, I would like to request that you strongly consider allowing the transfer of ownership of LPFM Construction Permits (CP) and “on the air” stations, under certain conditions.

No, I do not think there should be a “blanket” change which would allow transfers for any reason to anyone. Your “*prohibition on transfers or assignments of construction permits and licenses*” should be kept firmly intact **with respect to** commercial stations, corporations, etc.. However, a amendment is needed to allow transfer under certain situations, for instance:

1) the current CP/license holder no longer wishes to be responsible for running, maintaining or overseeing their LPFM. At the same time, there are others within the organization who have the original goal for the LPFM. These wish to carry on their organization’s or community’s original goals;

Example:

a local Chamber of Commerce, local Civic/Community Organization, etc., has had a major change of its board members; the new ones are not interested in its board’s goals during 2001 (when the LPFM application window was open).

2) The current owner/CP holder is not financially, or health wise, able to keep the LPFM station running, but there are other close associates/board members closely associated who have the owner’s same goals and would like to carry on instead.

Please consider these changes as I can not see how they could circumvent your original goals in creating the LPFM service.

Best regards,

A handwritten signature in black ink, reading "Rick J. Vogel". The signature is written in a cursive style with a large, stylized "R" and "V".

Rick J. Vogel

Libby Chamber of Commerce member